

Testimony

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on behalf of the

National Pork Producers Council

Before the

**Subcommittee on Forestry, Conservation and Rural Revitalization of the
United States Senate Committee on Agriculture, Nutrition, and Forestry**

***The Use of Technical Service Providers to Expand the USDA
Conservation Technical Assistance Capacity on Private Lands***

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INTRODUCTION

Good morning, Chairman Crapo and Ranking Member Lincoln, and good morning to all the Members of the Committee and staff. I am Doug Wolf, a pork producer from Lancaster, Wisconsin, and am a proud member of the National Pork Producers Council (NPPC). I am here this morning representing the U.S. pork industry. Along with my wife, son and daughter, we own and operate a mixed livestock and crop operation in the southwest portion of the state. We are a farrow to finish hog operation, raising sows and market pigs. We also raise corn, soybeans and hay. We have permanent pasture where we operate a cow-calf operation and we finish cattle at our farm. We, like our fellow pork producers and most everyone in agriculture, have always taken very seriously our responsibilities to conserve and protect the resources entrusted to us and the environment around us. We have tried to participate in, and help make successful, many of the USDA and state of Wisconsin conservation programs intended to help farmers, and perhaps we have been more active than average in this regard.

I am active in NPPC, serving on its Board of Directors and its 2007 Farm Bill Task Force. NPPC is very grateful to you Senator Crapo and you Senator Lincoln for the active, thoughtful and effective leadership you have demonstrated over the years on environmental and other issues important to pork producers. We are in this instance particularly grateful to you, Mr. Chairman, for holding this hearing and asking us to testify. NPPC has paid close attention to the use of technical service providers ("TSP") to expand the USDA conservation technical assistance capacity and we believe that we can offer you some sound observations as a result. I have also had very direct, personal and positive experience working with a TSP on my farm to develop a Comprehensive Nutrient Management Plan (CNMP), and I have also worked with NRCS technical assistance staff in the planning, design and implementation of conservation practices on my farm. I hope my practical experiences in this regard and recounted here will also be of assistance to you.

We know the members of this Committee understand better than anyone the significant economic contribution that pork producers make to the U.S. agricultural sector. Pork producers' farm gate receipts were approximately \$15 billion in 2005, representing almost a quarter of the value of meat animals produced by U.S. farmers, and slightly more than 10% of the total farm gate receipts received by all farmers. Pork producers, along with the other livestock and poultry producers, are the single biggest customers for U.S. feed grain producers, and our single largest expense, by far, is the feed we purchase for our animals. It is without a doubt that pork producers are strong and vital contributors to value-added agriculture in the U.S., and we are deeply committed

to the economic health and vitality of our businesses and the communities that our livelihoods help support.

Just as importantly, though, pork producers take a broad view of what it means to be environmentally responsible farmers and business people, and we have fully embraced the fact that our pork producing operations must protect and conserve the environment and the resources we use and affect. We take this responsibility with the utmost seriousness and commitment, and it was in this spirit that our producer members made a major commitment to the Conservation Title of the 2002 Farm Bill.

We were proud of how our commitment helped support in 2002 this Committee's and Congress' efforts to dramatically increase funding for conservation programs, particularly for the Environmental Quality Incentives Program (EQIP). Pork producers also provided strong support for the technical service provider provisions in the 2002 Farm Bill in anticipation of a greater need for nutrient management assistance under then pending Clean Water Act rulemaking. As a result, NPPC has monitored developments in this area closely and we believe that some of our observations can be helpful to the Committee.

NPPC was very encouraged when the 2002 Farm Bill reemphasized that EQIP was intended to help farmers deal with their top federal and state regulatory challenges. We looked forward to enthusiastically participating in the EQIP program to help us continue to improve our environmental performance and to meet and exceed any state or federal regulatory requirement.

A little later in this testimony I will present more about my operation and the conservation work we have done. I will also provide you with some observations about how the TSP program has worked nationally and then discuss my own personal and positive experiences with USDA-NRCS conservation technical assistance as well as with the TSP program. I will have some personal suggestions to offer the Committee about the TSP program for consideration. NPPC is preparing, with the full cooperation and assistance of NRCS, an analysis and a report on the performance of the EQIP program and of the TSP program. We are a few weeks away from finishing that work and so are not able to present that to you today. We will be happy to discuss with you these findings as soon as those materials are prepared. But some of our comments today have been shaped by what we have learned, preliminarily, from those efforts.

First, though, I would like to address some of our critical environmental challenges and the approach and perspective that pork producers bring to this work. Much of what follows next was in our June 7, 2006 testimony, but we believe it bears repeating here as we think this history about pork producers' work is quite important.

INCREASING THE LEVEL OF THE U.S. PORK INDUSTRY'S ENVIRONMENTAL PERFORMANCE

In the early and mid-1990s, pork production in this country was at the tail end of a period of intense and major changes in pork operations' size, type of production, geographic distribution, marketing, and contracting arrangements. Economics, competition, and the need to produce for and sell in a global marketplace drove these changes; it is a long and complicated story with many facets and implications. I will not go into this entire history today, but you may wish to revisit NPPC's testimony given by Mr. Jim Moseley before this Committee in April 1998, (prior to his appointment as the Deputy Secretary of Agriculture). His testimony gave a thorough accounting of the challenges we faced, at that time, and how pork producers had begun to aggressively address these issues.¹ I want to highlight some of the events that have particular relevance to protecting water quality and the subject of today's hearing.

All of the changes being experienced in the hog industry in the 1990s also brought some specific new challenges regarding managing, treating, storing, and using our animals' manure. The newness of their systems, producers' evolving familiarity and surety with how to best operate and manage them, and some really tough hurricane and tropical storm-related rainfall and flooding conditions, contributed in the mid-1990s to a handful of large and catastrophic releases of manure to water. These incidents, along with similar incidents around the country and certain court decisions involving livestock agriculture, were dramatic wake-up calls for us. Fortunately, we heard those calls and decided we had to help pork producers do a top-quality job of using the best science, technology, and practical know-how available to us to work to keep manure out of water, even under tough or extreme weather circumstances. We should have seen the water quality problems of the 1990s coming, and as an industry, we know that we could have done better. We do not intend to let it happen again.

In addition to recognizing this need and making this commitment, pork producers also made a major shift in policy direction. We concluded that as an industry we needed to support and actively embrace a national set of water quality regulatory standards and guidelines that were sound, science-based, practical, and effective. We knew that our primary manure management systems, whether anaerobic lagoons or slurry storage facilities, could perform to the highest levels

¹ "Testimony of Jim Moseley on behalf of the National Pork Producers Council Concerning Animal Waste Management before the Senate Agriculture, Nutrition, and Forestry Committee"; April 2, 1998. See:

http://agriculture.senate.gov/Hearings/Hearings_1998/moseley.htm

of water quality protections, a fact that's been borne out in the last several years by the rarity over this period of direct releases of swine manure to creeks, rivers, streams, lakes, and estuaries. For example, in the 2004-2005 year (July 1 to June 30) the two largest swine producing states, Iowa and North Carolina, had between them 35 discharges from approximately 8000 swine manure treatment or storage facilities. On average, less than one-half of one percent of all these facilities had a discharge. Our producers take great pride in these kinds of accomplishments, as they should, particularly when it is compared with the figures for the same period for other point source dischargers like municipal waste water facilities.²

But back in 1997, pork producers knew that without sound national standards, we would have a hard time achieving the kind of results reported for 2004-2005. More importantly, we feared that without national standards we would end up trying to operate under an extremely variable set of local and state standards, without assurance that these standards were rooted in sound and practical science. We feared that such a regulatory system would make it impossible to sustain hog production in the U.S. The first, most visible element of our commitment was to actively support and participate in the 1997 National Environmental Dialogue on Pork Production.

At the core of pork producers' interest in the Dialogue was our conviction that if we were to embrace water quality regulations, those regulations must be as uniform as possible to support a level playing field geographically and across hog operations of all sizes. Looking back on the Dialogue in 1999, Mr. Glen Keppy (currently serving as Associate Administrator of the United State's Department of Agriculture's Farm Service Agency (FSA)), a pork producer from Iowa, past NPPC President and Dialogue participant, said:

Through better and open communication, I believe that local and federal governments, conservationists, producers, and trade organizations can help insure an environmentally enhanced and viable livestock industry. For that reason, I was a member of the National Environmental Dialogue on Pork Production. It was composed of pork producers, county and state government officials, and special interest groups. We conducted a series of 12 meetings and discussed how we could work together to develop a blueprint for a level playing field so that producers could continue to produce pork in a manner consumers and environmentalists were

² For example, over this same period, municipal sewage treatment facilities in North Carolina had approximately 2000 incidents of the discharge of human sewage into North Carolina's waters.

comfortable with. You have to include everybody when you have a dialogue. You cannot just talk among yourselves³.

The Dialogue's participants included federal officials from the U.S. Environmental Protection Agency (EPA), the U.S. Department of Agriculture, heads of regulatory agencies from six states, and five pork producers. They met for a total of 24 days over the course of 9 months to visit farms and research institutions, and to share their experiences and perspectives. Public listening sessions were held to gather information and views from concerned citizens and scientific experts.

The Dialogue was an intense and extremely difficult process for pork producers. Nothing of this scope, magnitude, and environmental and business implications had ever been attempted before in our industry. It was path-breaking work, and it was hard. Hardest of all was to sit and listen to vehement critics of the U.S. pork industry. As they voiced their concerns and issues, pork producers understood that these views were sincerely held. Producers believed just as strongly that these views were often based on fundamentally incorrect understandings of modern U.S. pork production and pork producers. Producers also knew that if they did not listen to their critics, they could not get to the core of addressing the industry's water quality issues, nor could they restore their standing within their own rural communities. Some environmental groups chose not to participate in the Dialogue, and some participated and then chose to pull out when it became clear that the Dialogue was not a forum to pursue the elimination or substantial diminishment of the modern U.S. swine industry. In the end, in spite of challenges, the aggressive policies and provisions proposed by the Dialogue and subsequently endorsed by pork producers has served as the foundation and guiding principles for our work with communities, state and federal regulators.

Today, the policies and provisions articulated in the Dialogue have their direct counterparts in the state regulatory programs that emerged in the late 1990s and in the proposed federal Clean Water Act (CWA) Concentrated Animal Feeding Operation (CAFO) rule that the EPA released in 2003 (the 2003 CAFO rule). The 2003 CWA CAFO rule made the most fundamental changes in 30 years to the federal CWA program for animal agriculture. EPA estimated that more than 5,400 swine operations would be required to get a permit under the 2003 rule and that the costs to swine producers for complying with the requirements would be approximately \$348 million over 10 years⁴. A significant part of these costs

³ "Emerging Issues in Public Policy: Highlights of the 1999 National Public Policy Education Conference"; St. Paul, Minnesota, September 19-21, 1999; Page 25; Farm Foundation, (<http://www.farmfoundation.org/pubs/emerging/99emergingissues.pdf>).

⁴ EPA estimated the annual pre-tax costs for the final CAFO rule for large and medium CAFOs to be \$34.8 million. Applicable time period assumed here is 10 years, or a total of \$348 million. See Federal Register, Volume 68, Number 29, Page 7243m, Table 8.1.

came from brand new federal requirements about applying manure to land. Producers were required to develop and use a nutrient management plan (NMP) and adopt specific land application management and conservation practices. Given that the swine CAFOs likely to be subject to the new CAFO rule had a land base for manure application of more than 2.6 million acres, these regulatory requirements had enormous implications for the management of farming resources.⁵

This year, EPA is revising the 2003 CAFO rule because of a landmark federal court decision in 2005, applicable nationwide, that found key provisions of the 2003 rule to be illegal. NPPC and other agricultural and environmental groups had brought several lawsuits against EPA when the 2003 rule was issued. All of these suits were consolidated into one case before the New York based U.S. Court of Appeals for the Second Circuit (*Waterkeeper Alliance, Inc. v. EPA*). The most important aspect of the *Waterkeeper* decision is the point that NPPC argued—that the Clean Water Act National Pollution Discharge Elimination System (NPDES) program regulates the discharge of pollutants to water, but it does not regulate the potential to discharge, as EPA had proposed for CAFOs. The CWA does not require CAFOs to get NPDES permits simply based on a potential to discharge, nor could CAFOs be required to demonstrate that they did not have such a potential. Only CAFOs that are discharging could be required to get a CWA NPDES permit. The Second Circuit agreed.

NPPC's position before the Second Circuit should not be misunderstood, nor the *Waterkeeper* decision, as diminishing the 2003 CAFO rule's water quality protections. Under the *Waterkeeper* decision, all CAFOs still **must** prevent discharges of manure to water from their animal production areas, and they **must** still adopt sound and prescribed best management practices for the application of manure to land they own or control, including all records that demonstrate this is being done. Failure to do these things potentially subjects the CAFO to civil penalties of up to \$32,500 a day and criminal enforcement action. This is especially the case if the CAFO is operating without a CWA NPDES permit. Even if swine CAFOs choose **not** to get a federal NPDES permit, they will still choose to protect water quality through the prevention of direct discharges and the adoption of sound best management practices.

We believe that the *Waterkeeper* decision has resulted in the best of all possible regulatory worlds. First, we have clear and unequivocal national water quality protection standards that **must** and can be met by our producers and that will protect water quality. Second, producers can decide for themselves whether they meet these standards with or without a federal NPDES permit. Many of the

⁵ Confined Animal Production and Manure Nutrients--Noel Gollehon, Margriet Caswell, Marc Ribaud, Robert Kellogg, Charles Lander, and David Letson Agriculture Information Bulletin No. (AIB771) 40 pp, June 2001. See Table 2. (<http://www.ers.usda.gov/Publications/aib771/>)

dead-weight costs, as they are dubbed by economists, that come with a permitting program are thereby avoided, particularly the time and expense for the agency staff and the CAFOs of developing, managing, updating and revising the paperwork – without sacrificing water quality! This was the approach NPPC and pork producers advocated coming out of the National Environmental Dialogue on Pork Production, and today we believe it is still a sound approach.

Pork producers have worked hard at this and our other environmental issues and we are proud of what we have accomplished. And like anyone else, we are somewhat embarrassed by, but also greatly appreciate, when that work is recognized, as when U.S. Environmental Protection Agency Administrator Steve Johnson addressed NPPC's annual meeting earlier this year. Administrator Johnson said:

I also want to compliment you on the way you have responded to your environmental challenges in general ... (and) the great work your environment committee is doing ... not only to address the issues of today, but also to meet the opportunities of tomorrow. The implementation of the CAFO rule, your efforts on advanced manure management, and your support for sound and practical regulatory requirements are but a few of the issues you are addressing. I encourage you to keep at this progressive, pro-active approach.⁶

Mr. Chairman, I would be remiss if I did not bring your attention to one final important note. Our nation and the agricultural community have turned their considerable skills and talents to dealing with the issue of foreign oil dependence. As a sector, we have a long way to go, but I am highly pleased to report that pork producers are making a major contribution to energy independence through the aggressive and efficient use of manure as a source of crop nutrients. Throughout my part of the country and with essentially all of the corn producers with whom I work, demand for manure and its nutrients far exceeds the supply. This is being driven by the high price of commercially available nitrogen fertilizer. Depending on the nitrogen fertilizer being used, in the Corn Belt the per finishing hog fertilizer value of the manure is today estimated to be approximately \$1.50 to \$3.50 per head. This is a powerful incentive for energy conservation and efficiency, and everything I know about corn production in my part of the country leads me to believe this hog manure is being substituted for commercial nitrogen fertilizer as a result. That is a lot of energy savings, and I think this should be considered more closely as an option to really help agriculture increase its foreign oil energy independence.

⁶ Administrator Johnson, 2006 National Pork Industry Forum, Kansas City, MO; March 3, 2006.

See:

<http://yosemite.epa.gov/opa/admpress.nsf/a162fa4bfc0fd2ef8525701a004f20d7/25e0a1bef216f58d8525713a00766bff!OpenDocument>

SOME OF THE CONSERVATION HISTORY ON MY FAMILY'S FARM

As I mentioned in the introduction to this testimony, my family and I own and operate a mixed pork-cattle-row crop-hay and pasture operation. Our mainstay is a farrow to finish hog operation, but we also produce sizable quantities of corn, soybeans and alfalfa hay. And we also have permanent pasture for our cow-calf operation, and we finish beef cattle for the market every year.

We see our farm as a unit and have approached the management of our land, animals, crops, manure and all the related natural resources from a conservation perspective. We worked with USDA-NRCS local staff who provided us with the technical assistance to develop a Conservation Plan for our entire operation. We have then proceeded with the implementation of that plan, again often with NRCS technical assistance, where they have helped us in the design and implementation of many of the practices called for in our Conservation Plan. We have also used many of our own resources to secure private assistance to do the same. As a result, our farm is largely being managed to what NRCS would call a Resource Management System level. Perhaps this is most evident in the case of soil erosion, where we keep erosion below or at "T" (the NRCS soil loss tolerance level). We achieve this through the use of no-till or conservation tillage, and also through extensive use of vegetated contoured strips in our fields, conservation buffers to protect many critical areas, and rotational practices that enhance organic matter on and in our soil and otherwise help impede erosion.

When it comes to our animals' manure, we follow a strict and precise agronomic plan for its use and it is integral to our crop fertility program. We know we are avoiding considerable commercial fertilizer costs, and helping promote our country's energy independence, because we are fully crediting for the nitrogen and phosphorous content of our manure. We are fully aware of how our operations need to be best managed to sustain our environmental performance, aided in part by the knowledge we have gained through an On Farm Assessment Environmental Review (OFAER), provided by America's Clean Water Foundation and with the active support of NPPC. We are also managing our pastures for sound and efficient forage production and to ensure that a healthy stand is present and protecting the soil and the waterways in our fields from erosion. These practices include the use of rotational grazing.

With respect to the USDA farm bill conservation programs, we have CRP land on our farm, have installed conservation buffers and filter strips, and we are participating in EQIP. We have also implemented best management practices with financial assistance from Wisconsin's conservation programs. Most of this work has been done with technical and engineering assistance from NRCS field staff, although we have often also supplemented NRCS's contribution with help from the private sector. We have recently utilized the NRCS Technical Service

Providers program to work with a private sector provider to prepare a Comprehensive Nutrient Management Plan for our entire operation. And most recently, we have applied to participate in the Conservation Security Program at the Tier II level. Unfortunately, our application was not approved.

NPPC's NATIONAL PERSPECTIVE ON TSP PROGRAM

Why TSPs Are Needed—NPPC felt strongly during the debate on the 2002 Farm Bill that a strong and effective TSP program would be needed if USDA's amended and expanded conservation programs were going to be of maximum assistance to pork producers. NPPC has been and remains a supporter of NRCS's successful and important conservation technical assistance delivery system. But we also felt and continue to believe that the scope, intensity and type of new conservation and environmental work coming out of the Farm Bill and federal regulatory programs was going to be more than the existing NRCS staff could handle. The demands on the capable, local NRCS staff are simply too great to allow them to be uniformly available and effective in providing certain kinds of relatively specialized planning and assistance. This is certainly the case for Comprehensive Nutrient Management Plans and similar activities. In addition, NPPC was and remains of the view that the ongoing need to curtail federal spending and the push to limit the growth in federal staffing levels continues to add emphasis to the need for TSPs. It was for these reasons that we supported the expansion of the TSP provisions in the Farm Bill and the added emphasis on their use.

Expanding the Scope of USDA and NRCS's Capabilities—NPPC also believes that the more that NRCS embraces the use of TSPs, the more the country will benefit from the scope, reach, breadth and benefits of NRCS's particularly sound approach to natural resource conservation and environmental protection. NRCS could reach a significantly broader population of farmers with its site specific, soils-based model of supporting conservation and environment work if it can adapt itself to make full use of TSPs. NRCS's work would then not be limited to only the farmers that the federal staff can reach, but would be leveraged multiple times by all of the farmers that TSPs could reach and as guided by NRCS. We continue to feel that this is a highly laudable and reachable goal and encourage this Committee to pursue that objective with USDA.

Make it Simple and Efficient for the Farmer—The TSP rulemaking provided NRCS with considerable flexibility in how a farmer was given access to a TSP. NRCS has relied on two approaches in practice, both with merit. The first is to work at the state level to issue requests for proposals or requests for qualifications (RFP/RFQ) from TSPs to conduct specific TSP work. In 2003 and 2004, NPPC thinks the data will show that the majority of TSP funds used to secure TSP assistance from the private sector were expended in this manner. In

2005, the data will indicate that NRCS has shifted to another valuable approach. However, we believe this approach can be more complicated and difficult for the farmer. Additionally, the agency might see reductions in efficiency. and has hidden costs to the agency through reductions in efficiency and added oversight. This latter approach involves letting the farmer select their own TSP from a list of certified TSPs, get an invoice for the work from the TSP, submit that invoice to NRCS who in turn pays the farmer and who then in turn pays the TSP.

NPPC believes there are real merits to this “farmer’s-choice” approach and strongly encourage NRCS to continue its use and availability. But we believe there are tremendous merits to the RFP/RFQ model and encourage NRCS to sustain and expand its use. Under the farmer-choice model, many farmers find that what is required of them in terms of paperwork, management and oversight of the TSP to be so great that they do not want to get involved. While the RFP/RFQ approach leaves these responsibilities with NRCS, there is a net reduction in NRCS burden for the reasons discussed below. But the farmer-choice approach simply adds a layer of burden and hassle on the farmer. Furthermore, the RFP/RFQ or “bundling of work” approach has numerous other efficiencies of benefit to the taxpayer:

1. Efficient NRCS quality control—Once NRCS knows in great detail and with certainty a particular TSP’s qualifications (as a result of the RFP/RFQ process) and who will be users on multiple projects for multiple farmers, NRCS really only needs to check closely the work product for the first few projects to ensure they are being done correctly. NRCS then reviews the remaining work products, but can devote a much lower level of scrutiny. This saves NRCS time and money – and will save the producer time and money as well because fewer farmers will be waiting for NRCS approval before people are paid.
2. NRCS financial paperwork and accountability—While paperwork will be required of a TSP who is working on a set of projects under contract with NRCS, NRCS will be dealing with only one provider who will know and use properly the financial management systems with fewer errors and delays, and only one check will need to be cut. Audits of such work will only require an audit of one business relationship, not several.

A compelling case can be made for using the RFP/RFQ contracting approach when you add to its inherent taxpayer-benefiting efficiencies and the benefits of reducing farmer hassle, confusion and the waste of resources this entails. This RFP/RFQ contracting approach also retains the numerous taxpayer benefits of a competitive market system. An RFP approach always takes the TSP’s offered prices into account, and TSPs attempt to underbid each other for the work. The RFQ approach bases its cost off of market established rates for doing the work

under the contract and reflect similar competitive pressures to lower costs to what the market will pay.

We encourage the Committee to ensure that both of these approaches, farmer-choice and the RFP/RFQ, be widely used by NRCS.

Problems with NTE Rates—NRCS was faced with a major challenge when the 2002 Farm Bill was passed – what would NRCS pay TSPs for the thousands of possible services and practice assistance that a TSP could provide? NRCS has done an admirable job, in general, in developing those rates, called the not-to-exceed or NTE rates. But there are problems. First, there was no NTE rate established for a CNMP and that lack of understanding as to how to properly price a CNMP remains a considerable point of confusion in many locations where CNMP work is being requested. Secondly, farmers are often confused by the way NTE rates are presented and discussed. Even though the NTE rate is the maximum that NRCS will pay for this practice, it is **NOT the prevailing market rate**. The NTE rates are by design considerably less than the market rate. But when many farmers hear “not-to-exceed” they think it means “not-to-exceed” and that it is the prevailing market rate. A great deal of confusion and mistrust understandably emerges when a TSP rightly and fairly says they need to be paid more than NTE to do the work. NRCS needs to think this matter through and come up with language and an approach that clears this up.

FARM EXPERIENCE WITH NRCS TECHNICAL ASSISTANCE AND TSPs IN SOUTHWESTERN WISCONSIN

Technical Assistance—As I have noted earlier, we have found that working with NRCS technical assistance staff is to be uniformly positive. We have encountered some rough spots in working with NRCS, but this has not been a problem in their provision of technical assistance. Instead, it has always been in the relative rigidity with which certain NRCS conservation design standards and conservation principles are to be applied under NRCS policy on the ground, and we just have had to find a way to deal with these rough spots. But the local technical assistance staff have always been reasonably timely in their work, competent, effective and helpful. They have worked with me to find ways to adapt the programs and standards so that they can be successful under the specific circumstances on our farm. When it came to their technical assistance work, they never created expectations on my part that they were not able to meet.

All of the above speaks well to the NRCS technical assistance staff and delivery system. But at the same time, there are clear limitations. There are certain functions and conservation activities that would simply make no sense to look to NRCS staff to fulfill. It is not that they are not competent, but that they do not

have the time it would take to acquire the skills and experience to do some things. Or, in some circumstances, activities like the preparation of a full CNMP are so specialized that it makes complete sense to go to private sector individuals that have been able to develop the skill. There is also the simple fact that even if an NRCS field person has the skill and background, they may not have the time it takes, given their other pressing responsibilities, to get to your work in a reasonable time frame. This was the case on our farm when it came to our getting a CNMP and it was the reason I turned to a TSP.

USING A TSP FOR CNMP PREPARATION—As I said above, I used a private sector TSP to prepare our farms' CNMP. I used the "farmer-choice" approach, as that was what I found available to me at the time in Wisconsin. The quality of the work done was excellent and the TSPs were as professional as I have found in working with NRCS. They gave me plenty of one-on-one attention and had the time and took the time to explain to me everything I needed to know. And now I have a first rate CNMP and I thoroughly understand what it means and how to use it.

But if I were to change anything, it would definitely have been eliminating me as the middleman and instead to have had NRCS contract directly with a TSP to provide me and other producers in our state with a CNMP. While the process that we went through ultimately worked, it is clear to me that this took more time and resources than was really necessary. When it comes to these specialized services that are in broad demand, it must be more cost efficient for NRCS to find, secure and oversee the TSPs without having each and every farmer duplicate that. That would have been my preference, anyway. But all that said, I was able to make the process work, and the TSP and local NRCS staff worked well with me to make that happen.

CONCLUSION

On behalf of the National Pork Producers Council and the many pork producers we represent and support, we thank you once again for holding this hearing. We also want to thank you in advance for your continued and focused attention on the important contribution that private sector Technical Service Providers can make to agriculture's and pork producers' environmental performance. As I stated in my introduction, NPPC is preparing a report on the performance of the TSP program. As soon as that is finished later this summer, we will present you with these findings.

The nation's pork producers are most grateful for your continued leadership on these and other issues critical to U.S. pork producers and the U.S. pork industry, and we look forward to our continued strong working relationship with you and this Committee.